

1 RICHARD E. DONALDSON, ESQ., CHTD.  
2 RICHARD E. DONALDSON, ESQ.  
3 Nevada Bar No. 1095  
4 2300 West Sahara Ave., Suite 800  
5 Las Vegas, NV 89102  
6 Attorney for Plaintiff

7 UNITED STATES DISTRICT COURT  
8 DISTRICT OF NEVADA

9 \*\*\*\*\*

10 LAURA GRIESS )

11 Plaintiff, )

12 vs. )

13 NANCY A. BERRYHILL, ACTING )  
14 COMMISSIONER OF SOCIAL )  
15 SOCIAL SECURITY )

16 Defendant. )

Case No. 2:17-cv-00235-RFB-NJK

17 **STIPULATION FOR EXTENSION OF TIME TO FILE PLAINTIFF'S OBJECTIONS**  
18 **TO THE MAGISTRATE JUDGE'S REPORT AND RECOMMENDATION**  
19 **(First Request)**

20 IT IS HEREBY STIPULATED, by and between the parties through their respective  
21 counsel, that the Plaintiff, LAURA GRIESS, shall have an additional thirty (30) days, to  
22 and including Thursday, May 1, 2018, in which to file OBJECTIONS TO THE  
23 MAGISTRATE JUDGE'S REPORT AND RECOMMENDATION. This stipulation also  
24 requests that the schedule for a Response by the Defendant, Commissioner of Social  
25 Security, and other corresponding deadlines be adjusted accordingly.

26 The extension of time is necessary because Counsel, a solo practitioner and solely  
27 responsible for the preparation this Objection, has not been able to access the  
28 Recommendation for one week because of technical problems with Pacer and the EM/CEF  
security system Moreover, the administrative record is detailed and involves complex

1 issues. Undersigned Counsel has two forthcoming hearings that are both time and labor  
2 intensive. Consequently, there is inadequate time to prepare an Objection in this case  
3 within the allotted time. Counsel has spoken with the Commissioner's appellate counsel in  
4 this case, and he has no objection to stipulating to this extension.

5  
6 This is the first request for an extension of time.

7 Respectfully submitted,

8 Date: May 1, 2018

RICHARD E. DONALDSON, ESQ., CHTD.

9 /s/ Richard E. Donaldson

10 Richard E. Donaldson  
11 Nevada Bar No. 1095  
2300 West Sahara Ave., Suite 800  
12 Las Vegas, NV 89102  
Attorney for Plaintiff

13 Date: May 1, 2018


DAYLE ELIESON  
United States Attorney  
14 CHAD A. READLER  
15 Acting Assistant Attorney General, Civil Division

16 By: /s/ Ben A. Porter

17 Ben A. Porter, Esq.  
Office of the General Counsel  
Attorneys for Defendant

18  
19 IT IS SO ORDERED.

20 Date: May 2, 2018.

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RICHARD F. BOULWARE, II  
United States District Judge